

1 **RAMZY P. LADAH, ESQ.**
2 Nevada Bar No. 11405
3 **LADAH LAW FIRM**
4 517 S. Third Street
5 Las Vegas, NV 89101
litigation@ladahlaw.com
T: 702.252.0055
F: 702.248.0055
5 Attorneys for Plaintiffs
Jesse Cruz, Maria Cruz & Geovany Martinez

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 JESSE CRUZ, an Individual; MARIA CRUZ,
an Individual; GEOVANY MARTINEZ, an
Individual,

Case No.: 02:11-cv-00342-LDG-VCF
Consolidated:
2:12-cv-00051
2:12-cv-01627

Plaintiffs,

vs.

DANNY DURBIN, an individual;
CHAMPION TRANSPORTATION
SERVICES, INC., a foreign corporation;
CHAMPION LOGISTICS GROUP, INC., a
foreign corporation; DOES I through XX,
inclusive; and ROE BUSINESS ENTITIES I
through XX, inclusive.

Defendants.

**STIPULATION AND ORDER TO
CONTINUE DEADLINE FOR REPLY TO
DEFENDANT'S RESPONSE TO
PLAINTIFFS' MOTION TO EXCLUDE
DEFENDANT'S EXPERT WILLIAM
MESSERSCHMIDT (First Request)**

19 | AND ALL OTHER RELATED ACTIONS.

Pursuant to F.R.C.P. 6, and Local Rules 6-1, 6-2, and 7-1, the parties, by and through their undersigned attorneys of record, stipulate to a 6 day extension to the deadline set for replying to Defendant's Response to Plaintiff's Motion to Exclude Defendant's Expert William Messerschmidt (Document 253). The current reply deadline is March 17, 2016. The proposed deadline for reply shall be extended to March 23, 2016.

Pursuant to F.R.C.P. 6(b)(1), good cause exists for the extension because counsel for Plaintiffs, Jesse Cruz, Maria Cruz and Geovany Martinez, are unable to meet the current reply deadline due to scheduling conflicts with discovery in other cases.

1 In addition, there is no prejudice or any known conflict with potential trial dates.

2 DATED this 16th day of March, 2016.

DATED this 16th day of March, 2016.

3 **LADAH LAW FIRM**

4 /s/ *Ramzy P. Lada, Esq.*

5 **RAMZY P. LADAH, ESQ.**

Nevada Bar No. 11405

6 517 S. Third Street

Las Vegas, NV 89101

7 *and*

8 **PATRICK McKNIGHT, ESQ.**

Nevada Bar No. 4120

9 7473 W. Lake Mead Blvd., Ste. 100

Las Vegas, NV 89128

10 *Attorneys for Plaintiffs*

Jesse Cruz, Maria Cruz & Geovany Martinez

STEPHENSON & DICKINSON

/s/ *Bruce S. Dickinson, Esq.*

BRUCE S. DICKINSON, ESQ.

Nevada Bar No. 2297

MICHAEL E. HOTTMAN, ESQ.

Nevada Bar No. 8501

2820 W. Charleston Blvd., Suite 19

Las Vegas, Nevada 89102

Attorneys for Defendants

Danny Durbin & Champion Transportation

12 **O R D E R**

13 Based upon the foregoing Stipulation, IT IS SO ORDERED.

15 DATED this 5th day of April, 2016.



16
17 U.S. MAGISTRATE JUDGE

18 Respectfully submitted by:

19 **LADAH LAW FIRM**

20 /s/ *Ramzy P. Lada, Esq.*

22 **RAMZY P. LADAH, ESQ.**

Nevada Bar No. 11405

23 517 S. Third Street

Las Vegas, NV 89101

24 **PATRICK McKNIGHT, ESQ.**

Nevada Bar No. 4120

26 7473 W. Lake Mead Blvd., Ste. 100

Las Vegas, NV 89128

27 *Attorneys for Plaintiffs*

Jesse Cruz, Maria Cruz, & Geovany Martinez

